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7 Attorneys for Defendants
ALLEN LAM and XANTHE LAM
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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 XANTHE LAM and ALLEN LAM,

18 Defendants.
19 _____/

CASE NO. 18-CR-00527-WHA (JCS)

**APPLICATION FOR ORDER AND
[PROPOSED] ORDER WITHOUT
OBJECTION TO MODIFY
DEFENDANTS RELEASE
CONDITIONS**

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21 Comes now defendants ALLEN LAM and XANTHE LAM, by and through undersigned
22 counsel, MICHAEL STEPANIAN and WILLIAM OSTERHOUDT, who respectfully request
23 this Honorable Court modify defendants release conditions with respect to the 9:00 p.m. curfew,
24 to permit defendants to return home by midnight on Thanksgiving night, Thursday, November
25 22, 2018.

26 Assistant United States Attorney Matthew Parrella and Pretrial Services Officer Josh
27 Libby have been contacted and have no objection to this requested modification.
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2 DATED: November 14, 2018

Respectfully submitted,

3 /s/ Michael Stepanian
4 MICHAEL STEPANIAN
Attorney for ALLEN LAM

5 DATED: November 14, 2018

Respectfully submitted,

6 /s/ William Osterhoudt
7 WILLIAM OSTERHOUDT
8 Attorney for XANTHE LAM

9 DATED: November 14, 2018

ALEX G. TSE
United States Attorney

11 /s/ Matthew Parrella
12 MATTHEW PARRELLA
13 Assistant United States Attorney

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15
16 **[PROPOSED] ORDER**

17 GOOD CAUSE APPEARING IT IS HEREBY ORDERED THAT Defendants ALLEN
18 LAM and XANTHE LAM's release conditions are modified to permit defendants to return
19 home by midnight, Thursday, November 22, 2018.

20 DATED: November __, 2018

21 THE HONORABLE UNITED STATES
22 MAGISTRATE JUDGE JOSEPH C. SPERO
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